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ACCOMPLISHMENT PLAN, REGION VIII
ENVIRONMENTAL IMPACT STATEMENT REVIEW

ENVIRONMENTAL PROTECTION AGENCY

5 JUNE 1972

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ENVIRONMENTAL PROTECTION AGENCY

ROCKY MOUNTAIN-PRAIRIE REGION

REGION VIII

ACCOMPLISHMENT PLAN

ENVIRONMENTAL IMPACT STATEMENT REVIEW

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Recognizing that the review of environmental impact statements is an important mechanism for preventing environmental degradation in Region VIII, the regional office will review 115 environmental impact statements prepared by other Federal agencies in an average review time of 35 days and take appropriate followup measures to insure that the regional comments are adequately considered by other Federal agencies in their decision-making processes. The regional office will also provide assistance to other Federal agencies engaged in the EIS process. Procedures and coverage are discussed.

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ACCOMPLISHMENT PLAN

REGION VIII

ENVIRONMENTAL IMPACT STATEMENT REVIEW

JUNE 5, 1972

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REGIONAL ADMINISTRATOR

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EVALUATION

Environmental Impact Statement Review

Accomplishment Plan:

I. Problems

A. Environmental Problems

The Federal government is involved in many diverse activities in Region VIII with an overriding emphasis on natural resource development and protection. These activities include federal land management, water resource development, highways, airports power plants, 1976 Olympics, and waste treatment and disposal facilities.

Approximately 120 million acres of land in Region VIII or 32 percent of the total regional land area is owned by the Federal government. The majority of these Federal lands are managed by the Bureau of Land Management and the Forest Service, with smaller acreages managed by the Atomic Energy Commission, National Park Service, Bureau of Reclamation, Fish and Wildlife Service, Bureau of Mines, and the Department of Defense. Smaller acreages of Federal lands are used for installations such as military complexes, and post offices which are not managed in accordance with public land laws. Federal lands subject to the public land laws are managed for multiple uses such as forage production, timber, wildlife habitat, watershed, cattle grazing, minerals and recreation. Road construction is an important support function for many of these activities.

The primary environmental problems associated with Federal land management activities include:

1. Surface and ground water pollution problems (both point and diffuse) such as erosion and sedimentation, drilling mud disposal; mine drainage; leachate from tailings piles; brine disposal; oil and hazardous materials spills; liquid effluents from processing activities; radioactive leachates; waterborne pesticide residues; thermal pollution; and animal and human wastes.

2. Air pollution problems such as fugitive dust, timber slash burning, airborne pesticide sprays, and gaseous effluents from processing activities.

3. Solid waste problems such as timber slash disposal; mining and milling tailings disposal; garbage and refuse disposal; and solidified animal and human wastes; and

4. Noise problems from resource development activities and recreational activities.

Secondary environmental problems associated with Federal land management activities include downstream salinity; increased urbanization with related waste disposal problems; cumulative pesticide residues; and increased degradation in areas where the resources of the Federal lands are used (i.e. high energy demand areas). Other environmental problems outside of EPA's six primary areas of responsibility include aesthetics; water supply; flora and fauna impacts; rehabilitation and revegetation; incompatible land uses; wilderness; and destruction of archeological and cultural or historic sites.

The minerals of this region on Federal lands include: oil shale, coal, oil, natural gas, uranium, common varieties (sand, gravel), and hardrock minerals (gold, silver). The development of

these minerals includes such activities as: exploration; construction; conventional oil and gas recovery operations; underground nuclear gas and oil stimulation; mining operations (surface, underground, in-situ); oil, gas and mineral processing activities; product transportation (pipeline, trucks, etc.) and land rehabilitation. The critical areas of development that can be identified at this time are:

a. Colorado's Piceance Basin; Utah's Unita Basin; Wyoming's Washakie Basin for oil shale.

b. The Decker-Birney area of the Powder River Basin in Montana for coal development. The Decker-Birney area will be developed first and then the development will spread to the Powder River Basin and eventually to the entire Fort Union formation extending over portions of Montana, North and South Dakota, Wyoming and Canada.

c. Northwestern Colorado, southwestern Wyoming and northeastern Utah for oil and natural gas.

d. Southwestern Colorado, eastern Utah and eastern Wyoming for uranium.

e. Western Montana for hardrock minerals.

f. Sand and gravel operations are common throughout the region.

Timber harvesting practices of such agencies as the Forest Service, BLM and BIA continue to cause problems in this region. The controversy over clearcutting practices on the Bitterroot National Forest in Montana is the most recent example. Timber harvesting includes such activities as road construction; various cutting methods such as clearcutting and selective cutting; slash disposal; and reforestation. Timber harvesting

activities are conducted throughout the region but the most concentrated activities are in Western Montana and the Black Hills of South Dakota.

Serious erosion and salinity problems exist in this region as a result of overgrazing of public lands. Western Colorado around Grand Junction is an example. The expanding use of recreational vehicles (four wheel drive, trail bikes, and snowmobiles) are causing erosion problems, creating noise, affecting wildlife habitats, increasing air pollution and in general marring the landscape.

The activities of Federal water resource agencies such as the Bureau of Reclamation, Corps of Engineers and Soil Conservation Service are conspicuous in this region because of the arid climate. The environmental problem within EPA's area of responsibility associated with water resource projects include: reduced stream assimilative capacity when streams are impounded; irrigation return flows, which are high in dissolved solids, herbicides, pesticides and nutrients; waste treatment plant effluents discharged above reservoirs; erosion and siltation during construction and from mud flats resulting from reservoir operation; slash disposal, thermal shock on aquatic life; and noise. Broad policy problems associated with water resource projects include their effect on area growth and development patterns; land use problems and transbasin diversion. The most significant water resource projects are the Central Utah Project; Fryingpan Arkansas Project in Colorado; the Garrison Project in North Dakota and the North Central Power Study and related water resource projects in Montana & Wyoming.

Highway and airport projects involve the FHWA and FAA respectively. Such projects present water quality problems from pre- and post- construction erosion and stormwater runoff. Air quality problems result from fugitive dust and slash burning during construction as well as from the pollutants associated with increased air and highway traffic. Slash and refuse disposal present solid waste problems. Of increasing significance are the noise levels associated with increased highway and air traffic. A major issue, particularly in the Denver and Salt Lake metropolitan areas, is the effect of such projects on urban growth and land use. The circumferential highway and the new Stapleton Airport runway in Denver are examples. Of equal significance are projects in remote areas which threaten to destroy or alter wilderness, aesthetic and ecological values in national forests and parks. The proposed location of I-70 in Glenwood Canyon in Colorado and the proposed extension of the airport runway in Grand Teton National Park are examples.

Power plant projects, including hydroelectric, coal-fired steam generation, and nuclear, may involve such agencies as the Bureau of Reclamation, BLM, REA, AEC and FPC. The environmental problems associated with the operations of such power plants include those problems associated with support activities such as the mining and milling of uranium ores. The environmental problems include the discharge of highly mineralized blowdown waters; heated liquid effluents; wind and water erosion of tailings piles (including radioactive tailings); stack emissions; transmission lines and noise. The coal-fired steam generation plants included within the Southwest Energy study as well as the

Jim Bridger Plant in Wyoming and the various plants proposed in the North Central Power Study are examples. Coal gasification projects promise to present environmental problems for the region in the near future. Presently there is only one nuclear facility in the region at Ft. St. Vrain near Denver in Colorado although uranium mining and milling in western Colorado and centeal Wyoming is expected to increase significantly.

Colorado has been selected as the site for the 1976 Winter Olympics. Federal monies will be used to fund the games through existing Federal grant programs with agencies such as HUD, HEW and EPA and through a direct Congressional appropriation to be administered by an agency such as the Bureau of Outdoor Recreation. The potential environmental effects of holding the Olympic winter games in Colorado are basically twofold: physical impacts imposed on the specific sites for the various events, and the longer-range secondary impacts on growth stimulation and State land-use policies.

Agencies such as HUD, HEW, FHA and EPA have various grant and loan programs to support activities such as water quality management planning and solid waste disposal planning and to fund the construction of sewers, interceptors, solid waste disposal sites, and wastewater treatment facilities. The environmental problems associated with these activities include the impact of such projects on growth and land-use; compliance with water quality standards and solid waste disposal guidelines; and aesthetics.

Planning activities are particularly important in recreational areas such as Yellowstone National Park, Wasatch Front in Utah, Routt, and Pitken counties in Colorado, and the Black Hills where pressures for mountain developments and activities exceeding the carrying capacity of the land are greatest. In terms of numbers, most sewer interceptor, solid waste, and wastewater treatment facility projects in Region VIII are located in small communities. Projects in metropolitan areas such as the proposed expansion of the Denver Metro sewage treatment plant are the most significant because of the large population affected.

B. Administrative Problems

Federal agencies (including EPA) are experiencing many difficulties in implementing section 102(2)C of NEPA for proposed projects in Region VIII. The problems being encountered include:

1. The lack of consistent, reliable analytical techniques for performing an environmental assessment.

2. The lack of training of Federal personnel in the analytical technique of performing an environmental assessment.

3. Unfamiliarity of contractors and State and local officials in the requirements of NEPA and the technique for performing an environmental assessment.

4. The lack of an interdisciplinary approach to the preparation of environmental assessments and impact statements.

5. Difficulty in determining the proper project entity for which to prepare an EIS.

6. Failure to prepare overview impact statements in areas where a series of projects or actions are proposed which may have a detrimental cumulative impact on the environmental, social, and ultimately economic values of an area or region.

7. Failure to take the initiative to keep the public informed and involved in the decision-making process.

8. Difficulty in resolving lead agency determinations.

II. Objectives

Recognizing that the review of environmental impact statements is an important mechanism for preventing environmental degradation in Region VIII, the following objectives will be achieved:

A. The regional office will review 115 environmental impact statements prepared by other Federal agencies in an average review time of 35 days and take appropriate followup measures to insure that the regional comments are adequately considered by other Federal agencies in their decision-making processes.

B. The regional office will provide assistance to other Federal agencies engaged in the EIS process.

1. Assist other agencies in the identification of projects and proper project entities requiring the preparation of EIS's.

2. Provide Federal agencies with copies of any guidelines developed by EPA for review of EIS's.

3. Identify proposed actions of major regional or national significance and assist other Federal agencies in the preparation of EIS's.

C. The regional office will develop and implement mechanisms for informing the public about the EIS process and involving the public early in the decision-making process.

D. The regional office will review and upgrade the quality of EIS's prepared by EPA.

III. Strategy

The objectives will be achieved utilizing the resources of the following program elements in their entirety:

2A6114 Environmental Impact Statement Review/Air

2B6117 Environmental Impact Statement Review/Water

2D6119 Environmental Impact Statement Review/Solid Waste

Most of the planned accomplishments will be continuing activities.

It is estimated that the region will receive 115 draft environmental impact statements from other Federal agencies to review and comment on in FY 73. In addition to the draft impact statements, the region will also receive numerous preliminary draft impact statements and final impact statements to review and comment on. Preliminary drafts, drafts, and final impact statements will be subjected to the same in-depth review and comment procedure.

An interdisciplinary, intermedia procedure will be utilized to review and comment on impact statements with the entire regional staff as an interdisciplinary resource base. Review procedures and inter-office coordination will be streamlined so that the average review time for statements is 35 days.

It is estimated that at least 40 field investigations will be necessary to adequately review impact statements for controversial projects. To get the maximum benefit out of these investigations, resource people from other Federal agencies and the private sector will be asked to accompany our field team to explain the pertinent details of a proposed project. In particularly controversial situations, regional personnel may do limited resource inventory and sampling work. This will especially be the case for projects in which we are assisting in the EIS preparation.

The transmittal of comments to a Federal agency on controversial projects will be followed by appropriate actions to insure that the EPA comments are given due consideration. The follow-up techniques to be used include negotiations at the field level, contacting OFA for negotiations at the Washington level, contacting CEQ for assistance, advising public interest groups of our stand on particular projects and forming coalitions with these groups to impact decisions, and feeding our comments on controversial projects to the press.

To assist other Federal agencies in improving the administration of the EIS process, the regional office will contact periodically an estimated 25 Federal offices responsible for the majority of EIS projects in the region. These discussions will focus on the planning process of other Federal agencies to identify with sufficient lead time, those projects for which impact statements should be prepared. Particular attention will be directed toward idenifying proposed projects in critical priority areas. Controversial proposed projects will also be called to our attention through formal and informal contacts with the public.

Having identified projects for which impact statements should be prepared, the regional office will contact the other Federal agencies in writing, suggesting that an EIS be prepared. Appropriate pressures will be exerted through regional, Washington, CEQ and public channels to get results.

For projects of major regional or national significance, the regional office will assist other Federal agencies in the preparation of EIS's. These projects will be identified with sufficient lead time to plan for the commitment of resources. Three such projects have already been identified.

The Interior Department is proposing a prototype oil shale leasing program to stimulate development of the vast oil shale resources in Colorado, Wyoming and Utah. Under this program, six leases would be issued, two in each State. Major environmental problems will be confronted from surface mining, tailings disposal, wastewater disposal and wildlife disturbance. The regional office has been participating in an intergovernmental, interagency task force charged with recommending lease sites, developing lease stipulations, developing the EIS for the leasing program and overseeing the actual development activities. The preparation, review and comment of EIS's will continue in FY 73.

Vast quantities of coal in the Fort Union formation of Montana, Wyoming, North Dakota and South Dakota lie under Federal lands managed by BLM and the Forest Service. Pressures for development of these resources are substantial. BLM and Forest Service offices are flooded with lease applications. Many fragmented efforts by Federal, State, local and private entities are being taken to evaluate the environmental

impact of developing this coal. Administrator Ruckelshaus has suggested the need for an overview impact study of the entire coal development area. The regional office will act as a catalyst to stimulate inter-agency and intergovernmental cooperation in the development of these resources. The regional office will participate in the preparation of overview impact statements if requested to do so.

As mentioned previously, Colorado has been chosen as the site for the 1976 Winter Olympics. The regional office will assist the Department of Interior and the Bureau of Outdoor Recreation in the preparation of impact statements upon request

The regional office will assist OFA in developing guidelines listing air, water, solid waste, noise, pesticide and radiation criteria to be considered by other agencies in preparing EIS's. The regional office will develop guidelines for certain high priority activities in this region. The regional office will distribute these guidelines to other Federal agencies.

Public involvement in the EIS process will be improved by holding informal meetings and public meetings with concerned citizens and groups as the need arises. These meetings will be held to discuss proposed EPA actions and proposed actions of other Federal agencies. A public information brochure will be published by the end of October 1972 to describe the EIS process in every day language and encourage public involvement. Detailed procedures for handling impact statements from a public information point of view will be developed by the end of

July 1972 patterned after the procedures developed by the PUblic Affairs Division in Region VI.

To improve the quality of environmental assessment, environmental approaches and impact statements being prepared by the regional office for water quality management plans and wastewater treatment facilities, a one-day workshop for regional personnel will be held by the end of September 1972. The workshop will be patterned after the curriculum of the Civil Service Commission EIS Workshop. The regional office will supplement the guidelines prepared by OFA for preparation of environmental assessments by contractors, and lcoal and State officials. These guidelines will be given to contractors, and local and State officials and explained in detail as the need arises. It is estimated that this region will prepare up to 20 EIS's in FY 73 for water quality management plans and wastewater treatment facilities. An interdisciplinary, intermedia approach will be used in the preparation of these EIS's to insure that they comply with NEPA's requirements.

1. TYPE OF PLAN	2. PROGRAM SUB-ELEMENT TITLE	3. SUB-ELEMENT NO.	4. SHEET NO.
☐ a. SUB-ELEMENT ☐ b. PART SUB-ELEMENT ☐ c. GEOGRAPHICAL AREA	Environmental Impact Statement Review		1-2
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8. CODE	9. NO.	10. SCHEDULE DATE OF COMPLETION	11. PLANNED ACCOMPLISHMENTS
	1	6-30-73	Review 115 environmental impact statements in an average time of 35 days.
	2	6-30-73	Conduct 40 field investigations relative to EIS reviews, including sampling and resource inventory work as appropriate, particularly for projects for which we are assisting in preparation of EIS.
	3	6-30-73	Assure that Federal agencies prepare EIS's on all major projects that significantly affect environment by:
	4	6-30-73	a. Contacting 25 Federal offices to identify actions proposed or underway which might require EIS, particularly in accomplishment plan areas and other areas of critical concern.
	5	6-30-73	b. Determine if agency is preparing EIS. If not, request that EIS be prepared in writing.
	6	6-30-73	c. Identify proposed actions of major regional significance and assist other agency in preparing EIS, such as:
	7	6-30-73	1. Assist Interior Oil Shale Committee.
	8	6-30-73	2. Assist other agencies in preparing EIS on Fort Union coal development.
	9	6-30-73	3. Assist Interior & DOC in preparing EIS for 1976 Olympic sites

12. FY 1973		13. FY 1974		14. PREPARED BY AND DATE	15. REVIEW BY AND DATE
a. $1000	b. MAN-YEARS	a. $1000	b. MAN-YEARS	J. W. Geise May 26, 1972	
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PLANNED ACCOMPLISHMENTS SCHEDULE

1. TYPE OF PLAN	2. PROGRAM SUB-ELEMENT TITLE	3. SUB-ELEMENT NO.	4. SHEET NO.
☐ a. SUB-ELEMENT ☐ b. PART SUB-ELEMENT ☐ c. GEOGRAPHICAL AREA	Environmental Impact Statement Review		2-2
	5. GEOGRAPHICAL AREA TITLE	6. GEOGRAPHICAL AREA CODE	7. PRIORITY

8. CODE	9. NO.	10. SCHEDULE DATE OF COMPLETION	11. PLANNED ACCOMPLISHMENTS
	10	6-30-73	Assist OFA in developing EIS guidelines listing air, water, solid waste, noise, pesticide and radiation criteria to be considered by other agencies in preparing EIS.
	11	7-31-72	Develop procedures for public information and involvement in EIS process.
	12	10-31-72	Develop and publish public information brochure on EIS process.
	13	6-30-73	Exercise quality control over EPA's impact statements.
	14	9-30-72	a. Conduct 1-day workshop for regional EPA personnel on preparation of environmental assessments.
	15	6-30-73	b. Review 20 EIS's prepared by region.
	16	6-30-73	c. Meet with contractors, local and State officials as necessary to explain environmental assessment requirement.

12. FY 1973		13. FY 1974		14. PREPARED BY AND DATE	15. REVIEW BY AND DATE
a. $1000	b. MAN-YEARS	a. $1000	b. MAN-YEARS	I. W. Geise May 26, 1972	
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